

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**NADAJALIETTE MONTALVO,** )  
 )  
 **Plaintiff,** )  
 **v.** )  
 ) **Civil Action No. 3:24-cv-303**  
 **WORLDWIDE FLIGHT SERVICES** )  
 **INC. and IAS LOGISTICS DFW, LLC** )  
 **d/b/a PINNACLE LOGISTICS** )  
 )  
 **Defendants.** )

**DEFENDANTS' MOTION FOR AN ADDITIONAL EXTENSION OF TIME TO  
ANSWER OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT**

COME NOW Defendants Worldwide Flight Services, Inc., and IAS Logistics DFW, LLC, d/b/a Pinnacle Logistics ("Defendants"), by and through their undersigned counsel, and move the Court for an extension of time until May 17, 2024, to answer or otherwise respond to the Plaintiff's Original Complaint ("Complaint") filed by Plaintiff Nadajaliette Montalvo ("Plaintiff"). In support of this motion, Defendants state as follows:

1. Plaintiff's Complaint was filed on February 7, 2024.
2. Defendants were served with a summons and Plaintiff's Complaint on or about February 8, 2024.
3. The current deadline for Defendants to file their answer or other responsive pleading is April 19, 2024.
4. The parties are actively engaged in settlement negotiations and have made good progress in resolving their differences. Defendants request additional time to complete settlement negotiations to possibly avoid incurring the time and expense of answering Plaintiff's Complaint

and beginning pretrial activities. Thus, Defendants request additional time until May 17, 2024 to complete settlement negotiations and to answer or otherwise respond to Plaintiff's Complaint.

5. This Motion is not made for the purpose of delaying the adjudication of this case or for any other improper purpose but is made in good faith. Plaintiff will suffer no prejudice if the Court grants this Motion.

WHEREFORE, Defendants respectfully request that the Court grant an extension of time until May 17, 2024, to answer or otherwise respond to Plaintiff's Complaint. A proposed Order is attached hereto.

Respectfully submitted April 19, 2024.

**CONSTANGY, BROOKS, SMITH &  
PROPHETE, LLP**

*/s/ Hunter Johnson*

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ATTORNEYS FOR DEFENDANTS

**CERTIFICATE OF CONFERENCE**

I hereby certify that beginning on Wednesday, April 17, 2024, the undersigned counsel for Defendants attempted to confer with counsel for Plaintiff, Travis Gasper, several times regarding the relief requested but did not receive a response from counsel for Plaintiff as to whether this motion is opposed.

*/s/ Hunter Johnson*

**CERTIFICATE OF SERVICE**

I hereby certify that on April 19, 2024, a true and correct copy of the above and foregoing DEFENDANTS WORLDWIDE FLIGHT SERVICES, INC. and IAS LOGISTICS DFW, LLC, d/b/a PINNACLE LOGISTICS MOTION FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT was served via the Court's electronic case filing system, on the following:

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ATTORNEY FOR PLAINTIFF

/s/ Hunter Johnson  
Attorney for Defendants